

REMARKS

Claims 1-14 are pending.

In the Final Official Action, claims 1 and 5-9 were rejected under 35 U.S.C § 103(a) as being unpatentable over Rezaifar, U.S. Pat. Pub. 2004/0085931 in view of Dommety et al, "Fast Handovers for Mobile IPv6") (hereinafter "Dommety") and in further view of Dennison et al., U.S. Patent No. 6,847,822 (hereinafter "Dennison").

In response to Applicants' previous argument, the Examiner states that "Applicants argue that none of the prior arts used by the Examiner teaches using GPS means to identify the geographic location of a mobile user unit. The Examiner respectfully disagrees." Applicants believe that the Examiner is misinterpreting Applicants' argument. Notably, Applicants asserted, among other arguments, that none of the cited references teach "by using the GPS means the information gateways communicate prior to the mobile unit moving out of the first mobile information gateway area into the second mobile information coverage area so that an available IP address in the second mobile coverage areas is sent to the mobile user unit." *See Response*, page 6 and 7. Applicants did not assert that Dennison fails to teach a GPS means. Rather, Applicants asserted that none of the references teach proactively initiating the handovers using the GPS means to predict or anticipate the change of location.

In the claimed invention, the first information gateway uses the GPS information from the GPS means in the mobile unit to predict the change. Notably, each gateway includes its own GPS device. The gateways send their location to the other gateways. By virtue of knowing the location of the neighboring gateways and the current location of the mobile unit, the gateway can determine a list of probable areas that the mobile unit may likely move to as well as the gateway

that is located in the probable areas. Dennison does not teach using the GPS information to predict the change or starting the handover process earlier, as claimed. At best, Dennison teaches using the position information to determine which cell site is best suited to handle a communication process. A MTSO uses a look-up-table to select the cell site most appropriate.

The claimed invention has an advantage over the cited prior art. In the claimed invention, the handover process is started early. Dommetry fails to cure the above-identified deficiency. The Examiner cites page 12 in the current rejection in support of the conclusions. Applicants' submit that the cited section fails to support the position. Notably, the predictive handoff overview described in pages 11-14 is initiated by the mobile node. Specifically, the mobile node initiates a fast handoff by sending a router solicitation for proxy to the old access router. The message is an indication that the mobile node would like to perform handover and requests information. The message contains the identification of the new access router. *See* page 11. While, the reference states that the old access router can also initiate a handover for the mobile node, the reference does not teach that the access router selects when to start the process and which access router to handover based upon GPS information. In stark contrast, in the claimed invention the first information gateway uses the GPS information to predict when a handover will occur and which other gateway should be used.

Additionally, Applicants submit that the cited references, whether taken alone or in any combination thereof, fail to teach a first storage means for storing a list of **available** IP addresses in said first mobile coverage area and a second storage means for storing a list of **available** IP addresses in said second mobile coverage area. At best, the references suggest storing a list of **used** IP addresses or a pool of assignable IP addresses dedicated to a specific area. Dommetry

teaches that the list is stored in cache for a short time period so "it can defend it". The list of used IP addresses is not the same list, as claimed. The used IP addresses list is used for routing transmissions. Further, Rezaiifar teaches that each area is assigned a pool of IP addresses. The pool is dedicated to the specific area.

It is therefore respectfully submitted that none of the cited references, whether taken alone or in any combination thereof, teach or even suggest the claimed invention of independent claims 1 and 8. It is respectfully submitted that for the reasons set forth above, claims 1 and 8 should be deemed allowable over the art of record.

Claims 5-7 and 9 are dependent claims, dependent upon claims 1 and 8, respectively, and should likewise be deemed allowable over the art of record.

Claims 2-4 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Rezaiifar, in view of Dennison, further in view of Dommety and further in view of Johnson et al. (U.S. 6,625,135) (hereinafter "Johnson"). Claims 2-4 are dependent upon claim 1 and Johnson fails to provide the missing elements of claim 1 and hence, claims 2-4 should be deemed allowable over the art of record.

Claim 10 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Rezaiifar, in view of Dennison, further in view of Dommety and further in view of Budka et al. (U.S. 7,224,983) (hereinafter "Budka"). Claim 10 is dependent upon independent claim 8 and Budka fails to provide the missing steps in claim 8. Hence, claim 10 should be deemed allowable over the art of record.

Claim 11 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Rezaiifar in view of Dommety.

As noted above, Dommety teaches maintaining a list of **used** IP addresses, rather than a list of **available** addresses. In Dommety, the system updates the list of used IP address of the router so that the router knows the existence of mobile units within the domain. In contrast, the claimed invention dynamically updates a list of available IP addresses. Specifically, the claimed invention maintains a database which is regularly updated. By keeping a dynamic list of available IP addresses, the gateway can nearly eliminate the need for address conflict resolution.

Therefore, it is respectfully submitted that the cited references, whether taken alone or in any combination thereof, teach or even suggest the invention claimed in claim 11 and hence, claim 11 should be deemed allowable over the art of record.

Claims 12-14 were under 35 U.S.C. § 103(a) as being unpatentable over Rezaiifar in view of Dommety in further view of Johnson.

Claims 12-14 are dependent claims, dependent upon claim 11. Johnson fails to provide the missing step in claim 11. Therefore, it is respectfully submitted that the cited references, whether taken alone or in any combination thereof, teach or even suggest the invention claimed in claim 12, and hence claim 12 should be deemed allowable over the art of record.

In view of the above, it is respectfully submitted that this application is in condition for allowance. Accordingly, it is respectfully requested that this application be allowed and a Notice of Allowance issued.

Respectfully submitted,

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